



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JAN 28 2013

David I. Courcelle, Esq.
Law Office of David Courcelle, LLC
Executive Tower, Suite 185
3500 North Causeway Blvd
Metairie, LA 70002

RE: MUR 6623
William A. Bennett

Dear Mr. Courcelle:

On January 24, 2013, the Federal Election Commission accepted the signed conciliation agreement submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 441a(a)(1)(A), and 2 U.S.C. § 441(f), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Accordingly, the file has been closed in this matter.

Documents related to the case will be placed on the public record within 30 days. See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003) and Statement of Policy Regarding Placing First General Counsel's Reports on the Public Record, 74 Fed. Reg. 66132 (Dec. 14, 2009). Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B).

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 694-1650.

Sincerely,

Delbert K. Rigsby

Delbert K. Rigsby
Attorney

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

William A. Bennett

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MUR 662370

2022 DEC 25 10 2: 42

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that William A. Bennett ("Respondent") violated 2 U.S.C. §§ 441a(a)(1)(A) and 441f.

NOW, THEREFORE, the Commission and the Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

- I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).
- II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.
- III. Respondent enters voluntarily into this agreement with the Commission.
- IV. The pertinent facts in this matter are as follows:

BACKGROUND

1. William A. Bennett is the President of Benetech, LLC ("Benetech"), a limited liability company headquartered in New Orleans, Louisiana.
2. Julie V. Ott is the Chief Administrative Officer of Benetech.
3. During the relevant time period, Melanie Detloff was Bennett's spouse.

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4. During the relevant time period, James Wyckoff was the owner of United Property Development and served as a consultant to Benetech.
5. Scalise for Congress ("Committee") is the principal campaign committee of Representative Stephen Scalise.

**MAKING EXCESSIVE CONTRIBUTIONS AND CONTRIBUTIONS IN THE
NAME OF ANOTHER**

6. The Federal Election Campaign Act of 1971, as amended (the "Act"), prohibits any person from making a contribution in the name of another and from knowingly permitting his or her name to be used to make such a contribution. 2 U.S.C. § 441f.
7. During the 2007-2008 election cycle, a person could contribute no more than \$2,300 to a candidate and his or her authorized committee per election. *See* 2 U.S.C. § 441a(a)(1)(A).
8. On December 19, 2007, the Committee received four checks in the amounts of \$2,300 each from William Bennett, Julie Ott, James Wyckoff, and Melanie Detloff.
9. The Committee reported receiving these contributions in its 2007 Year End Report, filed January 31, 2008.
10. On June 15, 2011, William Bennett notified the Committee that he had reimbursed Ott, Wyckoff, and Detloff for their contributions to the Committee.
11. Because Mr. Bennett already made a \$2,300 contribution to the Committee, he could not make another contribution to the Committee under the Act's contribution limits.

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V. Respondent committed the following violations:

1. Respondent violated 2 U.S.C. § 441f by making a contribution in the name of another.
2. Respondent violated 2 U.S.C. § 441a(a)(1)(A) by making excessive contributions.

VI. Respondent will take the following actions:

1. Respondent will pay a civil penalty to the Federal Election Commission in the amount of Four Thousand Dollars (\$4,000), pursuant to 2 U.S.C. § 437g(a)(5)(A).
2. Respondent will cease and desist from violating 2 U.S.C. §§ 441a(a)(1)(A) and 441f.

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Except as otherwise provided, Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.


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- X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Anthony Herman
General Counsel

BY:


Daniel A. Petalas
Associate General Counsel
For Enforcement

Date

1/27/13

FOR THE RESPONDENT:

(Name)

(Position) *Attorney for William A. Bennett*

Date

12-17-12

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